

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:

Daniel I. Kerpelman et al.

Serial No.: 09/470,344

Filed: December 22, 1999

For: MEDICAL FACILITY
COMMUNICATIONS TOPOLOGY

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Group Art Unit: 3626

Examiner: Morgan, Robert W.

Atty. Docket: GEMS:0065/YOD
15-SV-5373

Assistant Commissioner
for Patents
Washington, D.C. 20231

CERTIFICATE OF MAILING
37 C.F.R. 1.8

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**AMENDED APPEAL BRIEF PURSUANT
TO 37 C.F.R. §§ 1.191 AND 1.192**

This Appeal Brief is being filed in furtherance to the Notice of Appeal mailed on January 27, 2003, and received by the Patent Office on February 3, 2003.

1. **REAL PARTY IN INTEREST**

The invention is under an obligation of assignment to GE Medical Technology Services, Inc., a Delaware corporation, N25W23255 Paul Road, Pewaukee, WI 53072, who will be directly affected by the decision on the present Appeal.

2. **RELATED APPEALS AND INTERFERENCES**

Appellants are unaware of any other appeals or interferences related to this Appeal. The undersigned is Appellants' legal representative in this Appeal.

3. **STATUS OF CLAIMS**

Claims 1-60 are currently pending, and claims 1-60 are currently under final rejection and, thus, are the subject of this appeal.

4. **STATUS OF AMENDMENTS**

All amendments made to the claims have been entered. No amendments have been made following the Final Office Action mailed September 25, 2002.

5. **SUMMARY OF THE INVENTION AND OF THE DISCLOSED EMBODIMENTS**

The present techniques relate generally to information infrastructures for hospitals, clinics, and other medical institutions. See Application, page 1, lines 6-7. More particularly, the present techniques relate to a technique for exchanging information within a medical facility via an improved topology linking various equipment and networks. See Application, page 1, lines 7-10.

Modern clinics or hospitals typically include imaging systems, such as magnetic resonance imaging (MRI) systems, computer tomography (CT) systems, ultrasound systems, x-ray systems, and so forth. See Application, page 1, lines 24-27. These systems may be stationary, while others may be moved around the facility as needed. See Application, page 1, lines 27-31. While the equipment may operate independently, many systems are now designed to interactively communicate information with outside components. See Application, page 2, lines 13-15. To communicate, the operations personnel may log onto a network, such as the internet or a virtual private network. See Application, page 2, lines 18-22. The level of coordination and delivery of data may pose certain problems and strain the network infrastructure. See Application, page 2, lines 25-32

Despite the need for improved techniques for linking individual networks, no satisfactory solution had yet been proposed prior to the present technique. The Appellants have developed techniques for permitting and coordinating the exchange of data among internal systems and networks along with external resources. See Application, page 3, lines 9-17. The technique provides an improved data

communications topology for a medical institution that offers rapid and effective data exchanged. See Application, page 3, lines 20-24.

A plurality of client diagnostic systems are connected to an internal network of the institution. See Application, Fig. 1, page 5, line 19 to page 6, line 19. A data communications control system ("DCCS") 40 permits data from the systems 24 to be accessed via the internal network. See Application, page 7, lines 20-24. The data may include service requests, requests for programs and software, requests for documentation and training materials, and so forth. See Application, page 78 lines 15-24. The data is then transmitted to a remote service provider as needed, through a reduced number of connections and data transmission sessions. See Application, page 7, lines 1-13. Data from the remote service provider is received by the control system and is distributed to designated diagnostic systems as desired. See Application, page 9, line 14 to page 10, line 6. The technique offers enhanced connectivity, facilitates data access and transfer, and provides for improved interconnectivity of devices and systems of the institution. See Application, page 7, line 20 to page 8, line 13.

In addition, the communications may involve a variety of technologies from modems, satellites, or even a direct link. See Application, page 9, lines 14-29. These technologies may be provided from the DCCS. See Application, page 10, lines 8-21. Further, the DCCS may be employed to track assets or clients, particularly mobile clients that may be traced through the internal network to specific locations. See Application, page 13, lines 4-7. Likewise, the DCCS may include a web browser to access sites on the internet and at the remote service provider. See Application, page 12, lines 1-14.

6. **ISSUES**

Issue No. 1:

Whether claims 1-60 are unpatentable under 35 U.S.C. § 103(a) as being rendered obvious by Wong et al. (U.S. Patent No. 6,260,021).

7. **GROUPING OF CLAIMS**

In regard to Issue No. 1, independent claims 1, 17, 32, 46, and 55 will stand or fall independently of one another. Dependent claims 2-16, 18-31, 33-45, 47-54 and 56-60 will stand and fall with their respective independent claims.

8. **ARGUMENT**

Issue No. 1:

The Examiner rejected claims 1-60 under 35 U.S. §103(a) as being unpatentable over Wong et al. (U. S. Pat. No. 6,260,021). The Examiner further cited the Microsoft Computer Dictionary, a router, an Internet service provider, Evans (U. S. Pat No. 5,924,074) to support assertions of recited features that are well known in the art. Appellants respectfully traverse this rejection.

The burden of establishing a *prima facie* case of obviousness falls on the Examiner. *Ex parte Wolters and Kuypers*, 214 U.S.P.Q. 735 (PTO Bd. App. 1979). Obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention absent some teaching or suggestion supporting the combination. *ACS Hospital Systems, Inc. v. Montefiore Hospital*, 732 F.2d 1572, 1577, 221 U.S.P.Q. 929, 933 (Fed. Cir. 1984). Accordingly, to establish a *prima facie* case, the Examiner must not only show that the combination includes *all* of the claimed elements, but also a convincing line of reason as to why one of ordinary skill in the art would have found the claimed invention to have been obvious in light of the teachings of the references. *Ex parte Clapp*, 227 U.S.P.Q. 972 (B.P.A.I. 1985). When prior art references require a selected combination to render obvious a subsequent invention, there must be some reason for the combination other than the hindsight gained from the invention itself, i.e., something in the prior art as a whole must suggest the desirability, and thus the obviousness, of making the combination. *Uniroyal Inc. v. Rudkin-Wiley Corp.*, 837 F.2d 1044, 5 U.S.P.Q.2d 1434 (Fed. Cir. 1988). One cannot use hindsight reconstruction to pick and choose among isolated

disclosures in the prior art to deprecate the claimed invention. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596 (Fed. Cir. 1988).

In contrast to the present application, the Wong et al. reference does not teach operational aspects or anything related to service or diagnostics within the reference. The Wong et al. reference is simply directed to providing uniform medical images. Wong et al., col. 1, lines 6-11. Specifically, the problem disclosed in the Wong et al. reference is related to the presence of a variety of medical image distribution systems, and a lack of uniform access of stored images from generated from the systems. Wong et al., col. 2, lines 17-67. Indeed, the reference specifically describes the requests as medical image requests that are received from clients. Wong et al., col. 4, lines 1-7. The workstations 38 receive medical images from the medical image server 12 via network links 36. Col. 8, lines 53-59. Clearly, the workstation 38 does not include medical diagnostic systems.

A. Claim 1 and The Claims Depending Therefrom

Claim 1 recites:

A medical facility data communications system, the system comprising:
an internal data communications network;
a plurality of clients coupled to the internal network and
uniquely addressed on the internal network; and
a data communications control system coupled to the internal network
for receiving client data from the clients, transmitting client data to a
remote service provider, receiving addressed data from the remote
service provider, and distributing the addressed data to the clients.

The Examiner rejected independent claim 1 under 35 U.S. §103(a) as being unpatentable over Wong et al. (U. S. Pat. No. 6,260,021). In the rejection, the Examiner relied on the Microsoft Computer Dictionary, a router, and an Internet service provider to provide support for recited features that are alleged to be well known in the art.

Appellants contend that the Examiner's rejection simply cannot stand for the following reasons. First, the Wong et al. reference does not disclose all of the recited

features, as summarized below. Secondly, the Examiner's "well known in the art" reference, the Microsoft Computer Dictionary, a router, or an Internet service provider, fails to cure the deficiencies of the Wong et al. reference. Finally, the Examiner's combination is improper, as the references provide no suggestion or motivation for the combination, and is inconsistent with the proposed combination.

i. The References Do Not Disclose At Least the Third Set of Recitations of Claim 1.

Specifically, claim 1 recites:

an internal data communications network.

The Examiner argues that this element is taught by the network links 36 in the Wong et al. reference.

Claim 1 further recites:

a plurality of clients coupled to the internal network and uniquely addressed on the internal network.

The Examiner argues that this element is taught by the workstation 38 connected via the network links 36 in the Wong et al. reference.

Claim 1 then recites:

a data communications control system coupled to the internal network for receiving client data from the clients, transmitting client data to a remote service provider, receiving addressed data from the remote service provider, and distributing the addressed data to the clients.

The Examiner admitted that the Wong et al. reference fails to explicitly teach this entire set of recitations.

As these latter elements are not disclosed in the Wong et al. reference, the Examiner alleged that these elements are "well known in the art." In the Response to the Office Action dated March 1, 2002, the Appellants respectfully requested the Examiner

to provide support under M.P.E.P. § 2144.03 for the Examiner's apparent assertion of what is "well known in the art."

To provide support for the assertion of elements that are "well known in the art," the Examiner cited to the definitions of a Domain Name System ("DNS"), Domain Name System Server, and a Remote Access Server ("RAS") in the Microsoft Computer Dictionary. These definitions, however, do not cure the deficiencies of the Wong et al. reference.

In the Final Office Action dated September 25, 2002, the Examiner stated:

The Examiner hereby directs Applicant's [sic] attention to the copies provided from the Microsoft Computer Dictionary (cited herewith) with definition of a Domain Name System (DNS), Domain Name System (DNS) server and remote access service, which is clearly evidence that while using the Internet as indication by the reference of Wong et al., a data communication control system utilize DNS and DNS Server to provide addresses enabling computer to access and connect with a server for receiving and transfer information. As such, the knowledge and use of data communications control system for transmitting client data to a remote service provider has clearly existed in the art prior to Applicant's claimed invention and the courts have held that even if a patent does not specifically disclose a particular element, said element being within the knowledge of a skilled artisan, the patent taken in combination with that knowledge, would put the artisan in possession of the claimed invention. *In re Graves*, 36 USPQ 2d 1697 (Fed. Cir. 1995).

In the Advisory Action dated December 23, 2002, the Examiner further stated that:

The operation of the Internet includes dialing up an Internet service provider (remote service provider) via modem with a router (data communication control system) that connects the network using the same communication protocols to pass information to and from each other. The definitions of a Domain Name System (DNS), Domain Name System (DNS) server and remote access service in the pervious Office Action are all components of using the Internet.

The Examiner asserts that the Microsoft Computer Dictionary definitions along with the teachings in the Wong et al. reference disclose the recitations that are explicitly missing from the Wong et al. reference. Also, in the Advisory Action, the Examiner cited a router and an Internet service provider, which were not cited in previous communications. It is unclear as to the specific meaning of the new terms because the Examiner failed to provide evidence to support the alleged teachings. However, despite the lack of a clear meaning or support for the Examiner's assertion, an Internet service provider is not equivalent to and does not disclose or suggest the remote service provider, as recited in the claims. Additionally, a router is not equivalent to and does not disclose or suggest a data communications control system, as recited in the claims. Thus, the Wong et al reference, the Microsoft Computer Dictionary definitions, a router, and an Internet service provider fail to disclose or even suggest the features recited in the claims.

ii. The "Well Known in the Art" References Do Not Provide the Missing Recited Features.

As the Examiner admitted that the Wong et al. reference fails to explicitly teach these features, the Microsoft Computer Dictionary, a router, and an Internet service provider must be utilized by the Examiner to disclose or suggest the features of "a data communications control system" or "a remote service provider," as recited in claim 1. With regard to the "data communications control system," the DNS, DNS server, and router definitions fail to cure the deficiencies of the Wong et al. reference. Indeed, a DNS and DNS server are merely one method of changing a named network device into a network address. In fact, a DNS or DNS server is used in a network to convert names, such as .com, .net, or .org, into IP addresses that are associated with each name. The DNS or DNS server does not receive client data nor would it transmit client data because these devices simply convert names into IP addresses. In addition, a router is simply a device that guides packets through a network between bridged segments by utilizing routing protocols. The router does not *receive client data* nor would it *transmit client data* because a router simply passes data packets through a network according to the protocol utilized by the network.

While “a data communications control system” may use a DNS, DNS server or a router, as suggested by the Examiner, the definitions or terms fail to disclose the “data communications control system” that *receives* “client data from the clients” and *transmits* “client data to a remote service provider,” as recited in the claim. In the present application, the data communications control system (“DCCS”) is described to include a variety of hardware components and functional circuitry. Application, Fig. 2, page 10, lines 8-16. These components include communication components, memory circuitry 92, and even a software suite 108 for running various diagnostic and service routines. Application, page 10, line 17 to page 13, line 20. Clearly, these generic definitions are not equivalent and do not disclose or suggest the *data communications control system* that *receives* “client data from the clients” and *transmits* “client data to a remote service provider,” as described and claimed in the present application.

Furthermore, the Microsoft Computer Dictionary and an Internet service provider fail to disclose the recited feature of “a remote service provider.” In the Office Action, the Examiner appears to equate the Remote Access Service to “a remote service provider,” while in the Advisory Action the Examiner appears to equate an Internet service provider with “a remote service provider.” As defined in the Microsoft Computer Dictionary, a Remote Access Service is merely a portion of a Windows software program that allows a user to gain access to the network server via a modem. The Remote Access Service fails to disclose or suggest a remote service provider because a software program is not equivalent to the “remote service provider,” recited in the claims. In addition, while the exact definition of the Internet service provider is not clear from the Examiner’s communications, an Internet service provider simply facilitates a connection from a user to the Internet. As such, the Internet service provider is not equivalent to the “remote service provider,” as described and claimed in the present techniques. Accordingly, while a Remote Access Service and an Internet service provider may be utilized by the present technique, the definitions fail to disclose the claimed subject matter.

In the present application, a “remote service provider” is described as a facility that may receive data and service requests from a medical diagnostic facility. Application, page 8, lines 15-24. The remote service provider is connected to the client diagnostic systems to exchange of operational or parameter data as required for servicing, maintenance, analysis, and other similar needs. Application, page 7, lines 1-5. The remote service provider may include various systems, such as an automated support center 64, electronic commerce systems 66, educational unit or system 68, as well as other systems. Application, page 8, line 26 - page 9, line 13. The Microsoft Computer Dictionary definitions are not equivalent and do not disclose the *remote service provider*, as described throughout the present application. As the definition of a Remote Access Service and an Internet service provider fail to disclose or teach a “remote service provider,” the definitions of these terms cannot cure the deficiencies of the Wong et al. reference.

Accordingly, the Examiner’s “well known in the art” assertions fail to render claim 1 and the respective dependent claims 2-16 obvious. Thus, claim 1 and the respective dependent claims 2-16 are believed to be patentable over the Wong et al. reference. For these reasons alone, Appellants request that the Board overturn the rejection and indicate the allowability of the claims. In addition to these reasons, the Examiner’s suggested combination is improper as discussed below.

iii. The Proposed Combination is Not Supported by and is Inconsistent with the References.

Finally, the Examiner’s reasoning unravels when one simply attempts to place the Microsoft Computer Dictionary definitions, a router, and an Internet service provider terms into the Wong et al. system in a forced argument that the missing recited features could be somehow inferred to one skilled in the art. The combination of the Wong et al. reference with the Microsoft Computer Dictionary, a router, and an Internet service provider is not supported by the references. Following the Examiner’s analysis, for the

sake of argument, let us assume that the network links 36 are equivalent to “an internal data communications network,” while the workstations 38 connected to the network links 36 are equivalent to “a plurality of clients coupled to the internal network and uniquely addressed on the internal network.” In the Wong et al. reference, the *only* other element connected to the network links 36 is the medical image server 12. See Wong et al., Fig. 1. The medical image server 12 provides information distribution between the first tier and the third tier systems. See Wong et al., col. 7, lines 11-14. The first tier systems include existing medical image information systems, such as systems 14 and 16. See Wong et al., col. 7, lines 1-6. The third tier systems include client systems, such as workstation 38.

Thus, under the Examiner’s analysis, the medical image server 12 of Wong et al. must somehow be replaced by the Microsoft Computer Dictionary definitions, a router, and an Internet service provider to provide the elements that are allegedly “well known in the art.” The functions of the medical image server 12 of Wong et al. are, however, inconsistent with such replacement, and are antithetical to the language of claim 1. According to Wong et al., the medical image server 12 is only taught to connect the network links 36 to the first tier items, which are internal hospital systems. *This is exactly the opposite of the system of claim 1.* According to the claim, the data communications control system communicates with a remote service provider, which is not on the internal network.

Again, the medical image server 12 of Wong et al. provides uniform distribution of information from the hospital systems to the workstation 38. This is the only and essential function of that element in the Wong et al. reference. This essential function is not and cannot be taught by the Microsoft Computer Dictionary, a router, or an Internet service provider. Rather, the Microsoft Computer Dictionary, a router, or an Internet service provider disclose computer software and networking terms that are merely one of many different technologies that may be used within a network. The RAS definition merely teaches that a Windows software program may be used to gain access to a

network server via a modem. Likewise, the DNS and DNS server definitions are simply an approach used to convert a specific name into an IP address. The router is merely a device that passes information from one network segment to another, while the Internet service provider merely allows Internet access to a user. Clearly, the internal hospital systems of Wong et al. are not analogous to the DNS, DNS server, RAS, a router, or an Internet service provider as proposed by the Examiner and would entirely lose their function in the Wong et al. system. Similarly, the essential function of the server 12 of Wong et al. would be completely redundant with the elements proposed by the Examiner.

Indeed, the Wong et al. reference and the Microsoft Computer Dictionary, a router, and an Internet service provider do not even provide a suggestion or motivation to combine. As discussed above, the Wong et al. is directed to creating a three-tiered information system. See Wong et al., col. 3, lines 20-22. In fact, the Wong et al. reference specifically teaches that the tiered levels interact with the medical image server 12 to provide uniformity. See Wong et al., col. 7, lines 9-14. However, in providing this tiered information system, the reference is devoid of any discussion related to DNS, DNS server, or even RAS. Instead, the reference discloses that specific protocols, such as COBRA, IDL, and IIOP, may be utilized to assist in providing the uniformity. See Wong et al., col. 7, lines 51-54. The DNS, DNS server, or even RAS are not disclosed, taught, suggested because these systems are unrelated to the issue being addressed in the Wong et al. reference. Moreover, the Microsoft Computer Dictionary merely provides definitions that do not provide any suggestion or motivation whatsoever for the combination proposed by the Examiner. In fact, the definitions are not even directed to issues disclosed or suggested in the Wong et al. reference.

Accordingly, the Examiner's proposed combination is unsupported by the teachings of the Wong et al. reference along with the Microsoft Computer Dictionary, a router, or an Internet service provider. Thus, the Appellants believe that claim 1 and the claims depending therefrom are clearly patentable over the cited references. Appellants request that the Board overturn the rejection and indicate the allowability of the claims.

B. Claim 17 and The Claims Depending Therefrom

Claim 17 recites:

A data communications system for a medical diagnostic facility, the system comprising:
a plurality of clients linked to an internal network, the clients including a medical diagnostic imaging system;
a data communications control system linked to the internal network for receiving client data from the clients, distributing addressed data to the clients, transmitting client data to a remote service provider and receiving addressed data from the remote service provider; and
an external network interface coupled to the data communications control system for transmitting the client data to the remote service provider and for receiving the addressed data from the remote service provider.

The Examiner rejected independent claim 17 under 35 U.S. §103(a) as being unpatentable over Wong et al. (U. S. Pat. No. 6,260,021). In the rejection, the Examiner relied on the Microsoft Computer Dictionary, a router, or an Internet service provider to provide support for recited features that are alleged to be well known in the art.

Appellants contend that the Examiner's rejection simply cannot stand for the following reasons. First, the Wong et al. reference does not disclose all of the claimed elements, as summarized below. Second, the Examiner's "well known in the art" reference, the Microsoft Computer Dictionary, a router, and an Internet service provider, fail to cure the deficiencies of the Wong et al. reference. Third, the references as combined fail to disclose at least the recited feature of "the clients including a medical diagnostic imaging system." Finally, the Examiner's combination is improper, as the references provide no suggestion or motivation for the combination, and are inconsistent with the proposed combination.

i. The References Do Not Disclose At Least the Third Set of Recitations of Claim 17.

Claim 17 recites:

a plurality of clients linked to an internal network, the clients including a medical diagnostic imaging system.

The Examiner argues that this element is taught by the workstations 38 connected to the medical image server 12 via the network links 36 of the Wong et al. reference.

Claim 17 then recites:

a data communications control system linked to the internal network for receiving client data from the clients, distributing addressed data to the clients, transmitting client data to a remote service provider and receiving addressed data from the remote service provider; and
an external network interface coupled to the data communications control system for transmitting the client data to the remote service provider and for receiving the addressed data from the remote service provider.

The Examiner admitted that the Wong et al. reference fails to explicitly teach this entire set of recitations.

As these latter features are not disclosed in the Wong et al. reference, the Examiner alleged that these features are “well known in the art.” In the Response to the Office Action dated March 1, 2002, the Appellants respectfully requested the Examiner to provide support under M.P.E.P. § 2144.03 for the Examiner’s apparent assertion of what is “well known in the art.”

To provide support for the assertion of elements that are “well known in the art,” the Examiner cited to the definitions of a Domain Name System (“DNS”), Domain Name System Server, and a Remote Access Server (“RAS”) in the Microsoft Computer Dictionary. In the Advisory Action, the Examiner cited a router and an Internet service provider to further assert that features were “well known,” but failed to provide support

for these assertions. As discussed above, these definitions, however, do not cure the deficiencies of the Wong et al. reference.

ii. The “Well Known in the Art” References Do Not Provide the Missing Elements.

As discussed above, the Microsoft Computer Dictionary, a router, or an Internet service provider do not disclose the elements of “a data communications control system” or “a remote service provider,” as recited in claim 17. Rather, the definitions of DNS, DNS server, and RAS along with the router or Internet service provider terms fail to cure the deficiencies of the Wong et al. reference. Indeed, these generic definitions and terms do not disclose the *data communications control system* or the *remote service provider* as those features are described throughout the present application, as noted above.

Accordingly, the Examiner’s “well known in the art” assertions fail to render claim 17 and the respective dependent claims 18-31 obvious. Thus, claim 17 and the respective dependent claims 18-31 are believed to be patentable over the Wong et al. reference along with the definitions.

iii. The References Do Not Teach the Recitation of “The Clients Including a Medical Diagnostic Imaging System.”

Moreover, the references, alone or in combination, still fail to disclose the feature of “clients including a medical diagnostic imaging system.” In the rejection and reiterated in the Advisory Action, the Examiner asserts that the “clients including a medical diagnostic imaging system” is equivalent to the workstations 38 in the Wong et al. reference. However, this assertion is unsupported by the Wong et al. reference and actually mischaracterized the recited feature of “a medical diagnostic imaging system,” as recited in the claim. In the reference, the workstations 38 are merely client computer systems that are used to view images. Wong et al., col. 8, lines 53-59. In fact, the workstations 38 are clearly used to view reports and images, and are not *a medical diagnostic imaging system*. In the present application, medical diagnostic imaging systems are described as being a

magnetic resonance imaging (MRI) system 26, a computed tomography (CT) system 28, an x-ray system 30, and an ultrasound system 32. See Application, Fig. 1, page 6, lines 8-14. The Wong et al. workstations 38 are not *a medical diagnostic imaging system*, but are simply workstations that are capable of viewing images from the server. As such, the reference does not disclose or teach that the workstations 38 are “medical diagnostic imaging system.”

Furthermore, the Examiner’s assumption regarding the inclusion of a medical diagnostic imaging system as a client is inconsistent with the teaching and problem addressed by Wong et al., which is a lack of uniformity in accessing stored images. See Wong et al., col. 3, lines 17-21. Indeed, the Wong et al. reference teaches that the workstations 38 should interface only with the medical image server 12, and not that the workstations 38 are or could be medical diagnostic imaging systems. In particular, the Wong et al. workstations 38 are merely defined as client systems and, as such, are not medical diagnostic imaging systems at all (e.g. MRI, ultrasound, CT, X-ray), as that term is used in the claimed context. See Application, page 6, lines 8-14. Thus, the Examiner’s assumption is unsupported because the reference fails to disclose or teach that the workstations 38 are “medical diagnostic imaging systems.”

Thus, claim 17 and the respective dependent claims 18-31 are believed to be patentable over the Wong et al. reference along with the Microsoft Computer Dictionary, a router, or an Internet service provider. For these reasons alone, Appellants request that the Board overturn the rejection and indicate the allowability of the claims. In addition to these reasons, the Examiner’s suggested combination is improper as discussed below.

iv. The Proposed Combination is Not Supported by and is Inconsistent with the References.

As discussed above, the combination of the Wong et al. reference with the Microsoft Computer Dictionary, a router, or an Internet service provider is not supported

by the references and do not provide any suggestion for the combination. Again, following the Examiner's analysis, even assuming the "plurality of clients linked to an internal network, the clients including a medical diagnostic imaging system" is taught by the workstations 38 connected to the medical image server 12 via the network links 36 of the Wong et al. reference. The *only* other elements connected to the medical image server 12 are the internal hospital systems. See Wong et al., Fig. 1.

Thus, under the Examiner's analysis, the medical image server 12 of Wong et al. must somehow be replaced by the Microsoft Computer Dictionary definitions and the router, or an Internet service provider to provide the elements that are allegedly "well known in the art." Again, the functions of the medical image server 12 of Wong et al. are, however, inconsistent with such replacement, and are antithetical to the language of claim 17. As noted above, according to Wong et al., the medical image server 12 is only taught to connect the network links 36 to the first tier items, which are internal hospital systems. According to claim 17, the data communications control system communicates with a *remote service provider* located on an *external network* and not on the internal hospital network.

Again, the medical image server 12 of Wong et al. provides uniform distribution of information from the hospital systems to the workstation 38. This is the only and essential function of the Wong et al. reference. This essential function is not and cannot be taught by the Microsoft Computer Dictionary, a router, or an Internet service provider. Clearly, the internal hospital systems of Wong et al. are not analogous to the DNS, DNS server, RAS, a router, or an Internet service provider as proposed by the Examiner and would entirely lose their function in the Wong et al. system. Similarly, the essential function of the server 12 of Wong et al. would be completely redundant with the elements proposed by the Examiner.

As discussed above, the Wong et al. reference and the Microsoft Computer Dictionary, a router, or an Internet service provider do not provide any suggestion or

motivation whatsoever for the combination proposed by the Examiner. Thus, the alleged combination is unsupported in the references.

Accordingly, the Examiner's proposed combination is unsupported by the teachings of the Wong et al. reference and the Microsoft Computer Dictionary, a router, and an Internet service provider. Thus, claim 17 and the respective dependent claims 18-31 are believed to be patentable over the proposed combination of the Wong et al. reference in view of the Microsoft Computer Dictionary definitions, a router, or an Internet service provider. For these reasons, Appellants requests that the Board overturn the rejection and indicate the allowability of the claims.

C. Claim 32 and The Claims Depending Therefrom

Claim 32 recites:

A communications system for a medical diagnostic facility, the system comprising:
an internal network;
a plurality of clients configured for connection to the network for transmission of client data and for receipt of addressed data, the clients including a physically mobile client; and
a data communication control system coupled to the internal network and to an external network for communicating client data and addressed data between the clients and a remote service provider, the data communications control system being configured to automatically access client data including data indicative of a location of the mobile client.

The Examiner rejected independent claim 32 under 35 U.S. §103(a) as being unpatentable over Wong et al. (U. S. Pat. No. 6,260,021). The Examiner further cited the Microsoft Computer Dictionary, a router, an Internet service provider, and Evans (U. S. Pat No. 5,924,074) to support assertions of recited features that are well known in the art in some of the claims.

Appellants contend that the Examiner's rejection simply cannot stand for the following reasons. First, the Wong et al. reference does not disclose all of the claimed

elements, as summarized below. Second, the Examiner's "well known in the art" references, the Microsoft Computer Dictionary, a router, or an Internet service provider and Evans reference, fail to cure the deficiencies of the Wong et al. reference. Third, the references as combined fail to disclose at least the element of "data indicative of a location of the mobile client." Finally, the Examiner's combination is improper, as the references provide no suggestion or motivation for the combination, and are inconsistent with the proposed combination.

i. The References Do Not Disclose At Least the Some of Recitations of Claim 32.

Claim 32 recites:

an internal network.

The Examiner argues that this element is taught by the network links 36 in the Wong et al. reference.

Claim 32 further recites:

a plurality of clients configured for connection to the network for transmission of client data.

The Examiner argues that these elements are taught by the medical imaging server 12 and a plurality of network attached client workstations 38 in the Wong et al. reference.

Claim 32 then recites:

the clients including a physically mobile client; and
a data communication control system coupled to the internal network and to an external network for communicating client data and addressed data between the clients and a remote service provider, the data communications control system being configured to automatically access client data including data indicative of a location of the mobile client.

The Examiner admitted that the Wong et al. reference fails to explicitly teach this entire set of recitations.

As these latter elements are not disclosed in the Wong et al. reference, the Examiner alleged that these elements are “well known in the art.” In the Response to the Office Action dated March 1, 2002, the Appellants respectfully requested the Examiner to provide support under M.P.E.P. § 2144.03 for the Examiner’s apparent assertion of what is “well known in the art.”

To provide support for the assertion of elements that are “well known in the art,” the Examiner appears to rely on the definitions of a Domain Name System (“DNS”), Domain Name System Server, and a Remote Access Server (“RAS”) in the Microsoft Computer Dictionary and cites the Evans reference to provide a physically mobile client. Additionally, in the Advisory Action, the Examiner cited a router and an Internet service provider to further assert that features were “well known” in the art. With regard to the Microsoft Computer Dictionary, a router, and an Internet service provider, and as discussed above, these definitions do not cure the deficiencies of the Wong et al. reference. With the Evans reference, the Examiner is using this reference to disclose a laptop computer, which is equated to “a physically mobile client.”

ii. The “Well Known in the Art” References Do Not Provide the Missing Elements.

In this rejection, the Examiner appears to be using the Microsoft Computer Dictionary, a router, and an Internet service provider as a basis disclosing the “data communications control system” and the “remote service provider, as noted above. However, the Microsoft Computer Dictionary, a router, and an Internet service provider do not disclose or suggest the features of “a data communications control system” or “a remote service provider,” as recited in claim 32. Thus, the definitions of a DNS, DNS server, and RAS along with the router, and Internet service provider terms fail to cure the deficiencies of the Wong et al. reference. Indeed, these generic definitions and terms do not disclose, suggest, or even teach the *data communications control system* or the *remote service provider* as those features are described throughout the present application.

iii. The References Fail to Teach “Data Indicative of a Location of the Mobile Client.”

Moreover, the references, alone or in combination, still fail to disclose the element of “data indicative of a location of the mobile client.” In the rejection, the Examiner admitted that the physically mobile client was not disclosed in the Wong et al. reference. Thus, to overcome the admitted missing recited feature, the Examiner asserted that the Evans reference discloses a physically mobile client. However, while the Evans reference does include a laptop computer 418, the reference fails to disclose or teach “data indicative of a location of the mobile client,” as recited in the claims. In fact, the computer laptop 418 is merely disclosed as a device that may attach to the LAN 400, but does not disclose or suggest any information that is associated with the location of the computer laptop. Accordingly, the Evans reference, the Wong et al. reference does not disclose or teach “data indicative of a location of the mobile client.”

In addition, the DNS, DNS server, RAS, a router, and an Internet service provider do nothing to indicate the location of a client. As discussed above, these definitions simply assist a protocol in functioning and do not provide “data indicative of a location of a mobile client,” as recited in the claim. The DNS and DNS server merely convert an IP address to a name, but the IP address and the name are not indicative of the location of the client. The RAS definition merely relates to a method of allowing remote users to access a network through a single server, but does not disclose, suggest or teach any data indicative to the location of the client. As noted above, the router merely passes packets from one network segment to another, while an Internet service provider simply enables a user to access the Internet. The router and the Internet service provider clearly do not provide data indicative of the location of a mobile client. Thus, the DNS, DNS server, RAS, a router, and an Internet service provider along with the Evans reference fails to disclose or teach “data indicative of a location of the mobile client,” as recited in the claim.

Accordingly, the Examiner's "well known in the art" assertions fail to render claim 32 and the respective dependent claims 33-45 obvious. Thus, claim 32 and the respective dependent claims 33-45 are believed to be patentable over the Wong et al. reference along with the Microsoft Computer Dictionary, a router, an Internet service provider, and the Evans reference. For these reasons, Appellants requests that the Board overturn the rejection and indicate the allowability of the claims 32-45. However, in addition to these reasons, the Examiner's suggested combination is improper as discussed below.

iv. The Proposed Combination is Not Supported by and is Inconsistent with the References.

Here again, the combination of the Wong et al. reference with the Microsoft Computer Dictionary, a router, an Internet service provider, and the Evans reference is not supported by the references. Again, following the Examiner's analysis, the "an internal network" is taught by the network links 36 in the Wong et al. reference and the "plurality of clients configured for connection to the network for transmission of client data" is taught by the medical imaging server 12 and a plurality of network attached client workstations 38 in the Wong et al. reference. As with claim 1, in the Wong et al. reference, the *only* other element connected to the medical image server 12 are the internal hospital systems. See Wong et al., Fig. 1.

Thus, under the Examiner's analysis, the medical image server 12 of Wong et al. must somehow be replaced by the Microsoft Computer Dictionary definitions or the router to provide the features that are allegedly "well known in the art." The functions of the medical image server 12 of Wong et al. are, however, inconsistent with such replacement, and are antithetical to the language of claim 32. According to Wong et al., the medical image server 12 is only taught to connect the network links 36 to the first tier items, which are internal hospital systems. *This is exactly the opposite of the system of claim 32.* According to the claim, the data communications control system is

communicating with a *remote service provider*, which is not on the internal hospital network.

Again, the medical image server 12 of Wong et al. provides uniform distribution of information from the hospital systems to the workstation 38. This is the only and essential function of the Wong et al. reference. This essential function is not and cannot be taught by the Microsoft Computer Dictionary, a router, an Internet service provider, or the computer laptop of the Evans reference. Clearly, the internal hospital systems of Wong et al. are not analogous to the DNS, DNS server, RAS, a router, an Internet service provider and computer laptop as proposed by the Examiner and would entirely lose their function in the Wong et al. system. Similarly, the essential function of the server 12 of Wong et al. would be completely redundant with the elements proposed by the Examiner.

Also, as discussed above, the Wong et al. reference and the Microsoft Computer Dictionary, a router, an Internet service provider do not provide any suggestion or motivation whatsoever for the combination proposed by the Examiner. Thus, the alleged combination is unsupported in the references.

Accordingly, the Examiner's proposed combination is unsupported by the teachings of the Wong et al. reference along with the Microsoft Computer Dictionary, a router, and an Internet service provider. Thus, claim 32 and the respective dependent claims 33-45 are believed to be patentable over the proposed combination of the Wong et al. reference in view of the Microsoft Computer Dictionary definitions a router, an Internet service provider, and the Evans reference. For these reasons, the Appellants respectfully request the Examiner to withdraw the rejections of claims 32-45 under 35 U.S.C. § 103. Yet, in addition to the reasons discussed above, the proposed combination still fails to disclose all of the elements claimed.

Accordingly, claim 32 and the respective dependent claims 33-45 are believed to be patentable over the proposed combination of the Wong et al. reference in view of the

Microsoft Computer Dictionary definitions, a router, an Internet service provider, and the Evans reference. For these reasons, Appellants requests that the Board overturn the rejection and indicate the allowability of the claims.

D. Claim 46 and The Claims Depending Therefrom

Claim 46 recites:

A method for communicating data in a medical diagnostic facility, the method comprising the steps of:

- (a) transmitting client data from a plurality of networked clients to a data communications control system via an internal network;
- (b) processing the client data in the data communications control system;
- (c) transmitting at least a portion of the client data from the data communications control system to a remote service provider via an external network.

The Examiner rejected independent claim 46 under 35 U.S. §103(a) as being unpatentable over Wong et al. (U. S. Pat. No. 6,260,021) in view of the Microsoft Computer Dictionary, a router, and an Internet service provider.

Appellants contend that the Examiner's rejection simply cannot stand for the following reasons. First, the Wong et al. reference does not disclose all of the claimed elements, as summarized below. Second, the Examiner's "well known in the art" reference, the Microsoft Computer Dictionary, a router, and an Internet service provider, fail to cure the deficiencies of the Wong et al. reference. Finally, the Examiner's combination is improper, as the references provide no suggestion or motivation for the combination, and are inconsistent with the proposed combination.

i. The References Do Not Disclose At Least the Third Set of Recitations of Claim 46.

Claim 46 recites:

(a) transmitting client data from a plurality of networked clients to a data communications control system via an internal network.

While the Examiner is not clear as to the specific elements, it is assumed by the Appellants that the Examiner is arguing that this element is partially taught by the workstations 38 connected to the network links 36 of the Wong et al. reference. It is further assumed that the Examiner is using the same basis for rejection that has been applied in the rejection of claim 1.

Claim 46 further recites:

- (b) processing the client data in the data communications control system;
- (c) transmitting at least a portion of the client data from the data communications control system to a remote service provider via an external network

The Examiner admitted that the Wong et al. reference fails to explicitly teach this entire set of recitations.

As these latter elements are not disclosed in the Wong et al. reference, the Examiner alleged that these elements are “well known in the art.” In the Response to the Office Action dated March 1, 2002, the Appellants respectfully requested the Examiner to provide support under M.P.E.P. § 2144.03 for the Examiner’s apparent assertion of what is “well known in the art.”

Again, to provide support for the assertion of elements that are “well known in the art,” the Examiner cited to the definitions of a Domain Name System (“DNS”), Domain Name System Server, and a Remote Access Server (“RAS”) in the Microsoft Computer Dictionary. Additionally, in the Advisory Action, the Examiner cited a router and an Internet service provider to further assert that features were “well known” in the art. However, as discussed above, these definitions and terms do not cure the deficiencies of the Wong et al. reference.

ii. The “Well Known in the Art” References Do Not Provide the Missing Elements.

As discussed above, the Microsoft Computer Dictionary, a router, and an Internet service provider do not disclose the elements of “a data communications control system” or “a remote service provider,” as recited in claim 46. Thus, the DNS, DNS server, RAS, a router, and an Internet service provider fail to cure the deficiencies of the Wong et al. reference. In the claims, the *client data* is transmitted to the *data communications control system* and processed by the *data communications control system*. The DNS, DNS server, RAS, and a router do not even look at the client data. Specifically, a router merely uses protocol information to guide client data through the network. None of these definitions or terms process client data or even access the client data. Further, the generic definitions and terms do not disclose the *remote service provider* as recited in the claims and described throughout the present application.

Accordingly, the Examiner’s “well known in the art” assertions fail to render claim 46 and the respective dependent claims 47-54 obvious. Thus, claim 46 and the respective dependent claims 47-54 are believed to be patentable over the Wong et al. reference along with the definitions and terms. For these reasons alone, the Appellants respectfully request the Examiner to withdraw the rejections of claims 46-54 under 35 U.S.C. § 103. However, in addition to these reasons, the Examiner’s suggested combination is improper as discussed below.

iii. The Proposed Combination is Not Supported by and is Inconsistent with the References.

As discussed above, the combination of the Wong et al. reference with the Microsoft Computer Dictionary, a router, and an Internet service provider is not supported by the references. Again, following the Examiner’s analysis, the workstations 38 connect to the network links 36, which teaches the “transmitting client data from a plurality of networked clients” ... “via an internal network.” As noted above with regard to the Wong et al. reference, the *only* other element connected to the network links 36 is the

medical image server 12 that connects to internal hospital networks. See Wong et al., Fig. 1.

Thus, under the Examiner's analysis, the medical image server 12 of Wong et al. must somehow be replaced by the Microsoft Computer Dictionary definitions, a router, and an Internet service provider to provide the features that are allegedly "well known in the art." The functions of the medical image server 12 of Wong et al. are, however, inconsistent with replacement, and are antithetical to the language of claim 46. According to Wong et al., the medical image server 12 is only taught to connect the network links 36 to the first tier items, which are internal hospital systems. Again, *this is exactly the opposite of the system of claim 46*. According to the claim, the data communications control system is communicating with a *remote service provider* located on an *external network*, which is not on the internal hospital network.

Again, the medical image server 12 of Wong et al. provides uniform distribution of information from the hospital systems to the workstation 38. This is the only and essential function of the Wong et al. reference. This essential function is not and cannot be taught by the Microsoft Computer Dictionary, a router, or an Internet service provider. Clearly, the internal hospital systems of Wong et al. are not analogous to the DNS, DNS server, RAS, a router, and an Internet service provider as proposed by the Examiner and would entirely lose their function in the Wong et al. system. Similarly, the essential function of the server 12 of Wong et al. would be completely redundant with the elements proposed by the Examiner.

As discussed above, the Wong et al. reference and the Microsoft Computer Dictionary, a router, and an Internet service provider do not provide any suggestion or motivation whatsoever for the combination proposed by the Examiner. Thus, the alleged combination is unsupported in the references.

Accordingly, the Examiner's proposed combination is unsupported by the teachings of the Wong et al. reference along with the Microsoft Computer Dictionary, a router, and an Internet service provider. Thus, claim 46 and the respective dependent claims 47-54 are believed to be patentable over the proposed combination of the Wong et al. reference in view of the Microsoft Computer Dictionary definitions, a router, and an Internet service provider. For these reasons, Appellants requests that the Board overturn the rejection and indicate the allowability of the claims 46-54.

E. Claim 55 and The Claims Depending Therefrom

Claim 55 recites:

- A method for managing data communications in a medical diagnostic facility, the method comprising the steps of:
- (a) coupling a plurality of clients to an internal network, the clients including at least one physically mobile client;
 - (b) transmitting client data from the clients to a data communications control system, the client data including at least data indicative of a location of the at least one mobile client; and
 - (c) storing the client data.

The Examiner rejected independent claim 55 under 35 U.S. §103(a) as being unpatentable over Wong et al. (U. S. Pat. No. 6,260,021) in view of the Microsoft Computer Dictionary, a router, an Internet service provider, and Evans (U.S. Pat. No. 5,924,074).

Appellants contend that the Examiner's rejection cannot stand for the following reasons, as discussed above. First, the Wong et al. reference does not disclose all of the recited features, as summarized below. Second, the Examiner's "well known in the art" reference, the Microsoft Computer Dictionary, a router, an Internet service provider, and the Evans reference, fail to cure the deficiencies of the Wong et al. reference. Finally, the references as combined fail to disclose at least the feature of "data indicative of a location of the mobile client."

i. The References Do Not Disclose At Least the Some of Recitations of Claim 55.

Claim 55 recites:

- (a) coupling a plurality of clients to an internal network, ...
- (c) storing the client data.

While the Examiner is not clear as to the specific features, it is assumed by the Appellants that the Examiner is arguing that this element is partially taught by the workstations 38 and the medical image server 12 being connected to the network links 36 of the Wong et al. reference. It is further assumed that the Examiner is using the same basis for rejection that has been applied in the rejection of claim 1.

Claim 55 further recites:

- (a) ... the clients including at least one physically mobile client;
- (b) transmitting client data from the clients to a data communications control system, the client data including at least data indicative of a location of the at least one mobile client.

The Examiner admitted that the Wong et al. reference fails to explicitly teach this entire set of recitations.

As these latter elements are not disclosed in the Wong et al. reference, the Examiner alleged that these elements are “well known in the art.” In the Response to the Office Action dated March 1, 2002, the Appellants respectfully requested the Examiner to provide support under M.P.E.P. § 2144.03 for the Examiner’s apparent assertion of what is “well known in the art.”

To provide support for the assertion of elements that are “well known in the art,” the Examiner appears to rely on the definitions of a Domain Name System (“DNS”) and Domain Name System Server in the Microsoft Computer Dictionary and the Evans reference. Additionally, in the Advisory Action, the Examiner cited a router and an Internet service provider to further assert that features were “well known” in the art.

However, as discussed above, the Microsoft Computer Dictionary definitions, the Evans reference, a router, and an Internet service provider do not cure the deficiencies of the Wong et al. reference.

ii. The “Well Known in the Art” References Do Not Provide the Missing Element.

In this rejection, the Examiner appears to be using the Microsoft Computer Dictionary and a router as a basis disclosing the “data communications control system.” However, as discussed above, for the Microsoft Computer Dictionary and router do not disclose the feature of “a data communications control system,” as recited in claim 55. Thus, the DNS, DNS server, and router fail to cure the deficiencies of the Wong et al. reference. Indeed, these generic definitions and term do not disclose the *transmitting client data to a data communications control system* as recited in the claims and described throughout the present application.

Accordingly, the Examiner’s “well known in the art” assertions fail to render claim 55 and the respective dependent claims 56-60 obvious. Thus, claim 55 and the respective dependent claims 56-60 are believed to be patentable over the Wong et al. reference along with the Microsoft Computer Dictionary and router. For these reasons, Appellants requests that the Board overturn the rejection and indicate the allowability of the claims 55-60. However, in addition to these reasons, the Examiner’s suggested combination fails to include all of the claimed elements as discussed below.

iii. The References Fail to Teach “Data Indicative of a Location of the Mobile Client.”

Moreover, the references, alone or in combination, still fail to disclose the feature of “data indicative of a location of the mobile client.” In the rejection, the Examiner admitted that the physically mobile client was not disclosed in the Wong et al. reference. Furthermore, the Examiner is merely using the Microsoft Computer Dictionary to disclose the definitions of DNS and a DNS server, and a router. Thus, to overcome the

admitted missing element, the Examiner asserted that the Evans reference discloses a physically mobile client. However, as discussed above, the Evans reference fails to disclose or teach “data indicative of a location of the mobile client,” as recited in the claims. In fact, the computer laptop 418 is merely disclosed as a device that may attach to the LAN 400. Thus, the Evans reference, the Wong et al. reference, the Microsoft Computer Dictionary, and a router do not disclose or teach “data indicative of a location of the mobile client.”

Accordingly, the Examiner’s has failed to include the all of the elements of the claimed subject matter. Thus, claim 55 and the respective dependent claims 56-60 are believed to be patentable over the proposed combination of the Wong et al. reference in view of the Microsoft Computer Dictionary, a router, and the Evans reference. For these reasons, Appellants requests that the Board overturn the rejection and indicate the allowability of the claims.

Conclusion

In view of the above remarks, Appellants respectfully submit that the Examiner has provided no supportable position or evidence that claims 1-60 are rendered obvious in view of the prior art. Accordingly, Appellants respectfully request that the Board find claims 1-60 patentable over the prior art of record and reverse all outstanding rejections.

Fees and General Authorization for Extensions of Time

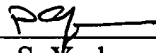
The Commissioner is hereby authorized to charge the fee for filing of the present Brief under 37 C.F.R. 1.17(c) in the amount of \$320.00 to Deposit Account No. 50-2402; Order No. 15-SV-5373/YOD (GEMS:0065).

In accordance with 37 C.F.R. § 1.136, Appellants hereby provide a general authorization to treat this and any future reply requiring an extension of time as incorporating a request therefor. Furthermore, Appellants authorize the Commissioner to

charge the appropriate fee for any extension of time to Deposit Account No. 50-2402;
Order No. 15-SV-5373/YOD (GEMS:0065).

Date: MAY 5, 2003

Respectfully submitted,



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9. **APPENDIX OF CLAIMS ON APPEAL**

1. A medical facility data communications system, the system comprising:
an internal data communications network;
a plurality of clients coupled to the internal network and uniquely addressed on the internal network; and
a data communications control system coupled to the internal network for receiving client data from the clients, transmitting client data to a remote service provider, receiving addressed data from the remote service provider, and distributing the addressed data to the clients.
2. The system of claim 1, wherein the internal data communications network includes at least one local area network.
3. The system of claim 2, wherein the internal data communications network includes a high speed Ethernet network.
4. The system of claim 1, wherein the clients include at least one medical imaging system configured to produce image data.
5. The system of claim 4, wherein the at least one imaging system is selected from a group including medical resonance imaging system, computed tomography systems, ultrasound systems, and x-ray systems.
6. The system of claim 1, wherein the clients include a hospital information system.
7. The system of claim 1, wherein the clients include a radiology department information system.

8. The system of claim 1, wherein the clients include a picture archiving and communication system.

9. The system of claim 1, wherein the data communications control system is configured to access data from networked clients in accordance with a predetermined data acquisition routine.

10. The system of claim 9, wherein the data accessed includes operational parameters of the clients.

11. The system of claim 9, wherein at least one of the clients is a mobile client, and wherein the data accessed includes location of at least the mobile client.

12. The system of claim 11, wherein the location of the at least one mobile client is accessed in response to connection of the at least one mobile client to the internal network.

13. The system of claim 1, wherein the data communications control system includes an operator interface, and wherein the system is configured to access data from networked clients in response to an operator request input via the operator interface.

14. The system of claim 1, further comprising an external network interface for exchanging client data and addressed data between the data communications control system and the remote service provider.

15. The system of claim 14, wherein the external network interface includes an interface for at least two different data communications media.

16. The system of claim 1, wherein all data communications between selected clients and the remote service provider are routed through the data communications control system.

17. A data communications system for a medical diagnostic facility, the system comprising:

a plurality of clients linked to an internal network, the clients including a medical diagnostic imaging system;

a data communications control system linked to the internal network for receiving client data from the clients, distributing addressed data to the clients, transmitting client data to a remote service provider and receiving addressed data from the remote service provider; and

an external network interface coupled to the data communications control system for transmitting the client data to the remote service provider and for receiving the addressed data from the remote service provider.

18. The system of claim 17, wherein the client data includes operational data for evaluating performance of the medical diagnostic imaging system.

19. The system of claim 17, wherein the internal network is a local area network and the external network is a wide area network.

20. The system of claim 19, wherein the internal network is an Ethernet network.

21. The system of claim 19, wherein the wide area network includes the Internet.

22. The system of claim 17, wherein the clients include a hospital information system.

23. The system of claim 17, wherein the clients include a radiology department information system.

24. The system of claim 17, wherein the clients include a picture archiving and communication system.

25. The system of claim 17, wherein the data communications control system is configured to access data from networked clients in accordance with a predetermined data acquisition routine.

26. The system of claim 25, wherein the data accessed includes operational parameters of the clients.

27. The system of claim 25, wherein at least one of the clients is a mobile client, and wherein the data accessed includes location of at least the mobile client.

28. The system of claim 27, wherein the location of the at least one mobile client is accessed in response to connection of the at least one mobile client to the internal network.

29. The system of claim 17, wherein the data communications control system includes an operator interface, and wherein the system is configured to access data from networked clients in response to an operator request input via the operator interface.

30. The system of claim 17, wherein the data communications control system is configured to store and execute communications interface routines interactively with the clients.

31. The system of claim 30, wherein the communications interface routines include a web browser routine.

32. A communications system for a medical diagnostic facility, the system comprising:

an internal network;

a plurality of clients configured for connection to the network for transmission of client data and for receipt of addressed data, the clients including a physically mobile client; and

a data communication control system coupled to the internal network and to an external network for communicating client data and addressed data between the clients and a remote service provider, the data communications control system being configured to automatically access client data including data indicative of a location of the mobile client.

33. The system of claim 32, wherein the control system is configured to detect the location of the mobile client upon connection of the mobile client to the network.

34. The system of claim 32, wherein the clients include a medical diagnostic imaging system, and wherein the client data includes operational data for evaluating performance of the medical diagnostic imaging system.

35. The system of claim 32, wherein the internal network is a local area network and the external network is a wide area network.

36. The system of claim 32, wherein the internal network is an Ethernet network.

37. The system of claim 36, wherein the wide area network includes the Internet.

38. The system of claim 32, wherein the clients include a hospital information system.

39. The system of claim 32, wherein the clients include a radiology department information system.

40. The system of claim 32, wherein the clients include a picture archiving and communication system.

41. The system of claim 32, wherein the data communications control system is configured to access data from networked clients in accordance with a predetermined data acquisition routine.

42. The system of claim 41, wherein the data accessed includes operational parameters of the clients.

43. The system of claim 32, wherein the data communications control system includes an operator interface, and wherein the system is configured to access data from networked clients in response to an operator request input via the operator interface.

44. The system of claim 32, wherein the data communications control system is configured to store and execute communications interface routines interactively with the clients.

45. The system of claim 32, wherein the communications interface routines include a web browser routine.

46. A method for communicating data in a medical diagnostic facility, the method comprising the steps of:

- (a) transmitting client data from a plurality of networked clients to a data communications control system via an internal network;
- (b) processing the client data in the data communications control system;
- (c) transmitting at least a portion of the client data from the data communications control system to a remote service provider via an external network.

47. The method of claim 46, comprising the further steps of receiving addressed data from the remote service provider via the data communications control system, and distributing the addressed data to an intended client via the internal network.

48. The method of claim 46, wherein the client data is transmitted to the data communications control system in response to a request from the control system.

49. The method of claim 48, wherein the control system includes an operator interface, and wherein the request is generated via the operator interface.

50. The method of claim 46, wherein the client data is transmitted to the control system in a transmission created by operator intervention at the client.

51. The method of claim 50, wherein the transmission is created via an interface routine executed interactively by the control system and client.

52. The method of claim 51, wherein the interface routine includes a web browser application.

53. The method of claim 46, including the step of storing client data for access by the control system.

54. The method of claim 46, including the step of logging communications between the clients and the control system.

55. A method for managing data communications in a medical diagnostic facility, the method comprising the steps of:

- (a) coupling a plurality of clients to an internal network, the clients including at least one physically mobile client;
- (b) transmitting client data from the clients to a data communications control system, the client data including at least data indicative of a location of the at least one mobile client; and
- (c) storing the client data.

56. The method of claim 55, wherein the client data indicative of the location of the at least one mobile client is transmitted upon connection of the at least one mobile client to the network.

57. The method of claim 55, comprising the further step of accessing client data representative of performance of the clients.

58. The method of claim 55, wherein the control system includes an operator interface, and wherein client data is accessed via the internal network in response to operator intervention via the interface.

59. The method of claim 55, comprising the further step of transmitting at least a portion of the client data to a remote service provider via an external network.

60. The method of claim 55, comprising the further steps of receiving addressed data at the control system via an external network, and distributing the addressed data to an intended client.